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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 07-0309 WHA
Plaintiff,)	
v.)	UNITED STATES' EXPERT WITNESS
)	DISCLOSURE
JOSE JESUS MADRIGAL-DIAZ,)	
Defendant.)	

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), the United States makes the following expert witness disclosure.

Kenneth Woods is a fingerprint Specialist with the Department of Homeland Security, Immigration and Customs Enforcement, Forensic Document Laboratory in McLean, Virginia. His curriculum vitae has been attached as Exhibit A.¹

In summary, at trial Mr. Woods will testify as to his review and examination of numerous documents bearing fingerprint impressions from Jose Jesus Madrigal Diaz. The United States

¹ Mr. Wood's curriculum vitae was previously disclosed to defense counsel on August 30, 2007.

1 anticipates that Mr. Woods will offer his expert opinion that the fingerprint impressions
2 appearing on each document he reviewed and examined were made by the same individual. He
3 will testify that his opinion was established by an analysis, comparison, and evaluation of the
4 friction ridge detail on the items he reviewed. Mr. Woods will also testify that his conclusions
5 are based on the two fundamental principles of friction ridge identification: (1) friction ridges
6 present in fingerprints begin to develop in the fetus and persist, unchanged, until after death when
7 decomposition destroys the ridged skin and (2) no two fingerprints are the same, even in identical
8 twins. Mr. Woods will further testify that the means of arriving at this conclusion was based on
9 the standard ACE-V (Analysis, Comparison, Evaluation – Verification) methodology and he will
10 further explain this methodology. His reports, which detail the documents he reviewed and the
11 bases and reasons for his opinion, are attached as Exhibit B.²

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14 SCOTT N. SCHOOLS
United States Attorney

15 DATED: September 5, 2007

16 /s/
DENISE MARIE BARTON
Assistant United States Attorney
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28 ² Mr. Woods' reports have been previously disclosed to defense counsel on August 30 and September 5, 2007.